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E-FILED - 1/17/08

11 UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13
14 TRACY WATSON et. al.,) No. C06-4029 RMW
15 Plaintiffs,)
16 v.) **STIPULATION AND ORDER
17 COUNTY OF SANTA CLARA et. al.,) RESETTING TRIAL DATE AND ALL
18 Defendants.) PRETRIAL DEADLINES**
19

20 The parties submit the following Stipulation and Proposed Order for the purpose of
21 requesting that the Court postpone by 120 days the trial date, presently set for June 9, 2007, and
22 all pretrial deadlines.

23 The parties hereby agree and stipulate that additional time is necessary in order to
24 complete discovery, disclosures, and trial preparation.

25 Further, defendants contend that a final resolution of a pending appeal by Plaintiffs Tracy
26 Watson and Renee Stalker of the jurisdiction and disposition orders of the Superior Court of
27 California, County of Santa Clara, Juvenile Division pertaining to the child-dependency
28 proceedings of Plaintiffs Olivia Stalker, Shafer Watson, and Riley Watson in the Court of

1 Appeal of California, Sixth Appellate Division, could have a bearing on their defenses in this
2 matter. On information and belief, the parties to that appeal have not completed briefing of the
3 matter and are not expected to complete briefing for at least several months. As such, it is
4 unlikely that the state court appeal will reach final disposition prior to the June 9, 2008 trial
5 date.

6 Accordingly, the parties stipulate to have the trial date and all pretrial deadlines, including
7 the last date to hear dispositive motions and all general discovery and expert discovery
8 deadlines, postponed by 120 days, as set forth in the following schedule:

9	Trial	October 6, 2008
10	Pretrial Conference	September 25, 2008
11	Last day to hear dispositive motions	August 8, 2008
12	Expert disclosure	July 11, 2008
13	Discovery cut-off	August 8, 2008

14 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
15 "conformed" signature (/S/) within this efiled document.

16 ANN MILLER RAVEL
17 County Counsel

18 Dated: January 14, 2008

19 By: _____ /S/
20 MELISSA R. KINIYALOCTS
Deputy County Counsel
21
22 Attorneys for County Defendants

23 Dated: January 8, 2008

24 By: _____ /S/
25 JACQUELYN K. WILSON
Attorney for Evergreen School District
26 Defendants
27
28

1
2 Dated: January 11, 2008

3 By: /S/
CLIFF GREENBERG

4 Attorney for City of San Jose Defendants

5
6 Dated: January 4, 2008

7 By: /S/
PETER JOHNSON

8 Attorney for Plaintiffs

9
10 Dated: January 3, 2008

11 By: /S/
ROBERT R. POWELL
12 Attorney for Plaintiffs

13
14 **ORDER RESETTING TRIAL DATE AND ALL PRETRIAL DEADLINES**

15 The Court, having considered the stipulation of the parties and finding good cause, hereby
16 orders that the June 9, 2008 trial date and all pretrial deadlines, including the last date to hear
17 dispositive motions and all discovery and expert discovery deadlines, are reset according to the
18 following schedule:

Trial	October 6, 2008
Pretrial Conference	September 25, 2008
Last day to hear dispositive motions	August 8, 2008
Expert disclosure	July 11, 2008
Discovery cut-off	August 8, 2008

25 Dated: 1/17/08

26
27
28 
HONORABLE RONALD M. WHYTE
United States District Court Judge